

The Honorable Judge John C. Coughenour

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Cause No. No. CR04-334JCC
v.)	
)	Defendant Gianis' Requested
KYLE GIANIS,)	Voir Dire Questions
)	
Defendant.)	
_____)	

Comes now the defendant, Kyle Gianis, through his attorney, Peter A. Camiel, and requests that the Court ask the following questions of the prospective jurors:

Association with Law Enforcement/Crime Victim or Witness

1. Have you, a close family member, or a close friend ever worked for a law enforcement agency, including any municipal, county, state or federal law enforcement agency?
2. Have you ever received any law enforcement training?
3. Have you, a close family member, or a close friend ever worked as a probation or parole officer?
4. Have you ever appeared in court as a witness in a criminal case?

**Defendant Gianis' Requested
Voir Dire Questions**

1 5. Have you or a close family member or friend ever been charged with a crime?

2
3 6. Have you ever had a particularly positive or particularly negative experience with a law
4 enforcement officer?

5
6 7. Do you have a strong positive or negative opinion about the government's entry into plea
7 bargains whereby a person receives a lesser sentence in return for giving testimony against another
8 person?

9
10 8. Would you automatically find that a law enforcement officer's testimony was entitled to more
11 weight than that of a non law enforcement witness?

12
13 9. Do you believe that a law enforcement witness would be more credible by virtue of his
14 profession than a non law enforcement witness?

15 **Education and Training**

16 10. Have you ever had any educational courses or training in the field of psychology or social
17 work?

18
19 11. Have you ever had any education or training in the mental health field?

20
21 12. Have you ever had any training as a nurse or doctor?

22
23 **Drug Laws and Drug Abuse**

24 13. Do you have strong opinions about the government's enforcement of our drug laws?

25
26 14. Do you belong to any organizations that advocate reform or repeal of drug laws?

1 15. Have you, a close family member or a close friend ever charged with a drug crime?

3 16. Have you, a close family member or a close friend ever sought treatment for substance abuse?

6 17. Have either drug dealing activity or substance abuse problems impacted your life in any way?

7 **Prior Jury Service**

8 18. Have you ever served as a juror before in a civil or criminal case?

10 19. If you have, would anything regarding your prior jury experience make it difficult for you to
11 sit as an impartial juror in this case?

12 **Juror Concerns**

13 20. Do you have vision or hearing restrictions or any other medical conditions that should be
14 brought to the attention of the court?

16 21. Do you have any personal experience in your life which you believe would impact your ability
17 to be a fair and impartial juror in this case?

18
19 22. Do you have any strongly held opinions which you believe would make it difficult for you
20 to sit as a fair and impartial juror on this particular type of case?

22 **Conclusion**

23 Defendant requests permission to supplement additional questions or ask follow up questions
24 based on responses of the prospective jurors.

1 DATED this 22nd day of May, 2008.

2 /s/ Peter A. Camiel

3 Attorney for Defendant Gianis

27
28 **Defendant Gianis' Requested
Voir Dire Questions**

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2008 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant(s) and plaintiff.

/s/ Peter A. Camiel, WSBA #12596